

**\*\* FILED \*\***

**4:36 pm, Jul 20, 2022**

**U.S. DISTRICT COURT**

**EASTERN DISTRICT OF NEW YORK**

WK:JBD  
F. #2022R00564

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

ALANTIS BOBBIE GRIFFIN,  
DINAH SARAI LEYBOT and  
LETAVIA COMORA QUINONES,

Defendants.

----- X

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Import Cocaine)

1. In or about June 2022, within the Eastern District of New York and elsewhere, the defendants ALANTIS BOBBIE GRIFFIN, DINAH SARAI LEYBOT and LETAVIA COMORA QUINONES, together with others, did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 952(a) and 960(a)(1). The amount of cocaine involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, was 500 grams or more of a substance containing cocaine.

(Title 21, United States Code, Sections 963 and 960(b)(2)(B)(ii); Title 18, United States Code, Sections 3551 et seq.)

INDICTMENT

Cr. No. **1:22-cr-00332(DG)(CLP)**

(T. 21, U.S.C., §§ 841(a)(1),  
841(b)(1)(B)(ii)(II), 846, 853(a), 853(p),  
952(a), 960(a)(1), 960(b)(2)(B)(ii), 963 and  
970; T. 18, U.S.C., §§ 2 and 3551 et seq.)

COUNT TWO  
(Importation of Cocaine)

2. On or about June 27, 2022, within the Eastern District of New York and elsewhere, the defendants ALANTIS BOBBIE GRIFFIN and DINAH SARAI LEYBOT, together with others, did knowingly and intentionally import a controlled substance into the United States from a place outside thereof, which offense involved 500 grams or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(2)(B)(ii); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THREE  
(Importation of Cocaine)

3. On or about June 27, 2022, within the Eastern District of New York and elsewhere, the defendant LETAVIA COMORA QUINONES, together with others, did knowingly and intentionally import a controlled substance into the United States from a place outside thereof, which offense involved 500 grams or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(2)(B)(ii); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FOUR  
(Conspiracy to Distribute Cocaine)

4. In or about June 2022, within the Eastern District of New York and elsewhere, the defendants ALANTIS BOBBIE GRIFFIN, DINAH SARAI LEYBOT and LETAVIA COMORA QUINONES, together with others, did knowingly and intentionally

conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of cocaine involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, was 500 grams or more of a substance containing cocaine.

(Title 21, United States Code, Sections 846 and 841(b)(1)(B)(ii)(II); Title 18, United States Code, Sections 3551 et seq.)

COUNT FIVE

(Possession of Cocaine with Intent to Distribute)

5. On or about June 27, 2022, within the Eastern District of New York and elsewhere, the defendants ALANTIS BOBBIE GRIFFIN and DINAH SARAI LEYBOT, together with others, did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved 500 grams or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SIX

(Possession of Cocaine with Intent to Distribute)

6. On or about June 27, 2022, within the Eastern District of New York and elsewhere, the defendant LETAVIA COMORA QUINONES, together with others, did knowingly and intentionally possess with intent to distribute a controlled substance, which

offense involved 500 grams or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II); Title 18, United States Code, Sections 2 and 3551 et seq.)

#### CRIMINAL FORFEITURE ALLEGATION

7. The United States hereby gives notice to the defendants that, upon their conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Sections 853(a) and 970, which require any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p),

to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

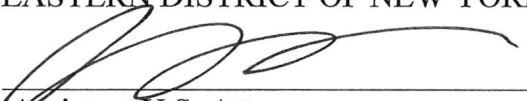
(Title 21, United States Code, Sections 853(a), 853(p) and 970)

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

By:

  
\_\_\_\_\_  
Assistant U.S. Attorney  
*Amy Busa*

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**  
EASTERN *District of* NEW YORK  
CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

*ALANTIS BOBBIE GRIFFIN, DINAH SARAI LEYBOT and  
LETAVIA COMORA QUINONES,*

Defendants.

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**INDICTMENT**

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(B)(ii)(II), 846, 853(a),  
853(p), 952(a), 960(a)(1), 960(b)(2)(B)(ii), 963 and 970;  
T. 18, U.S.C., §§ 2 and 3551 et seq.)

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*A true bill.*

\_\_\_\_\_

*Foreperson*

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

Bail, \$ \_\_\_\_\_

***Joshua B. Dugan, Assistant U.S. Attorney (718) 254-6144***